UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS CIVIL ACTION NO:

BHARANIDHARAN PADMANABHAN MD PhD)
(Dr Bharani)) SWORN COMPLAINT
- PLAINTIFF)
) JURY TRIAL DEMANDED
vs.)
)
ROBERT SWEENEY)
- DEFENDANT)

EXHIBIT 6

scleroplex inc.
Bharani Padmanabhan MD PhD
Multiple Sclerosis Neurologist
30 Gardner Rd. Suite 6A, Brookline MA 02445
+1 617 566 6047 phone + fax

VIA CERTIFIED MAIL
AND HAND DELIVERY

20 September 2016

Subject: Massachusetts Chapter 93A Demand Letter

Dear Constable Sweeney,

This letter is to inform you pursuant to M.G.L. ch. 93A §9(3) that you have thirty (30) days from the date of this letter to make a reasonable offer to compensate me for damages caused to me by:

1 your moral turpitude,
2 your conscious attempt to conceal 16 returns of proof of service,
3 your conscious refusal to furnish the returns,
in violation of M.R.C.P Rule 4 and ch. 238 § 13E,
4 your conscious refusal to comply with court rules and regulations,
5 your conscious refusal to comply with your obligations as a licensed constable,
6 your conscious violation of my constitutionally-protected due process rights,
7 your conscious decision to allow 15 defendants to escape justice.

It was entirely your job and responsibility to ensure my right to have service properly performed on the defendants was protected. It was entirely your job and responsibility to ensure you complied with M.R.C.P Rule 4 given you are a licensed constable.

It is inescapable that you conspired with the defendants to conceal the returns from me and the court so they could escape justice.

Relief sought by me within 30 days includes -

(1) payment of substantial compensation satisfactory to me, in the sum of $3 million, for the unjustified damage and malicious actions described above;
(2) a written apology to me, apologizing for your bad faith and unfair deceptive actions, personally signed by you.

Failure to make a reasonable settlement offer will result in formal litigation in Massachusetts and will subject you to public exposure of the fact that you consciously chose to obstruct justice by concealing official documents from the court and that you consciously violate the constitutionally protected due process rights of your clients.

The courts have repeatedly declared such conduct to be fraudulent and negligent. Your action violated Chapter 238 § 13E and Chapter 93A. Given the overwhelming evidence of fraud on your part, punitive damages against you and terrible publicity are assured should we proceed to litigation.

A reasonable offer in settlement will, in addition to avoiding the harsh light of public scrutiny, also avoid further attorney time and expense that you will incur if I am forced to commence litigation to vindicate my rights.

This letter more than meets the court's standard of review for a Ch. 93A demand letter. I prefer to get things done earlier than later and look forward to a reasonable response from you within the statutory thirty (30) days.

Sincerely,

20 September 2016

Bharani Padmanabhan MD PhD
President and CEO

scleroplex inc.
Bharani Padmanabhan MD PhD
Multiple Sclerosis Neurologist
30 Gardner Rd. Suite 6A, Brookline MA 02445
+1 617 566 6047 phone + fax
scleroplex@gmail.com
6 October 2016

Re: 93A demand letter

Dear Attorneys Meyerson and Franklin,

Greetings!

I write in regards to your client Mr Robert Sweeney. As you know, on February 12, 2015, Mr Sweeney agreed to serve 16 summonses and complaints and charged me fees upfront.

Today the City Manager's Office for the City of Cambridge informed me that Mr Sweeney was not sworn in as a Constable for the years 2012 through 2016 and had no Constable Surety Bond on file with the City of Cambridge for that same period.

What this means is that in February 2015 when your client held out to me and to the general public that he is a licensed Constable running a regular store-front business in Cambridge, MA, called "Constable Services" that took in summonses and capiases to be served on behalf of clients, he was criminally impersonating a law enforcement officer and committing a conscious fraud on the clients as well as on the judicial system of this Commonwealth.

What this means is Mr Sweeney, at a minimum, committed a Crime against Public Justice, G.L.c. 268, § 33, a crime punishable with "imprisonment for not more than one year."

This is fraud on a massive scale that is even larger than that of the EMTs who bribed their way to renewal of their licenses.

This is fraud on the level of Annie Dookhan as it means that every single summons and complaint taken in and served by Mr Sweeney was improper and ineffective.

In our meeting yesterday, Mr Meyerson, you informed me that your firm had hired Mr Sweeney to serve hundreds of complaints and other court documents over many years. Every single one of those was improperly and illegally served.

Pursuant to the SJC's Rules of Professional Conduct, now that you have been informed of this fact, it is mandatory that you inform all parties affected by this in all of the cases where you had Mr Sweeney serve papers.

It is your obligation to inform all the attorneys for all the litigants that service was improper and ineffective.

It is your obligation to inform the District Attorney in all jurisdictions where Mr Sweeney served papers while fraudulently claiming to be a Constable in conscious violation of G.L.c. 268, § 33, and especially the City of Cambridge.

It is now clear that my decision to bring accountability under Chapter 93A to the actions of Mr Sweeney, a law passed specifically to punish and deter fraudulent and deceptive practices, was the proper procedure.

I am certain that you will agree, as licensed attorneys, that Mr Sweeney's action was consciously fraudulent and consciously deceptive and certainly one that you do not condone.

Despite your assertion yesterday that my 93A letter was frivolous, as you can see, it was not.

Please contact me at your earliest with a truly reasonable offer that includes the "triple damages" allowed for in egregious cases of criminal conduct such as this, an offer that does not qualify as an "insult" as described by the SJC in *Rhodes v. AIG Domestic Claims, et al.*, 461 Mass. 486 (2012).

Yours sincerely,

Bharani Padmanabhan

Bharani Padmanabhan MD PhD